

*Offer of
Proof Ex #1*

**The Peoples Gas Light and Coke Company
Ill.C.C. Docket 01-0707
Response to Citizens Utility Board's and City of Chicago's First Interrogatories
Pursuant to Illinois Supreme Court Rule 213**

1. Please identify any of Peoples' responses to the data requests identified in the above requests for admission that (1) were (are) known to incomplete or inaccurate and (2) have not been supplemented, amended or corrected. Also, please provide supplemental, amended, or corrected responses for each such data requests.

Answer: None.

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2. Identify the Person(s) responsible for preparing the response to this Request for Admissions and Interrogatories. Also, identify the Person(s) responsible for preparing the responses to the data requests identified as the subject of the Request for Admissions. Submit a copy of all instructions prepared by the Company relating to the steps taken to respond to this Request for Admissions. Where oral instructions were given, identify the Person who gave the instructions, describe the content of the instructions, and the Person(s) to whom the instructions were given. For both this Request for Admissions and the data requests that are the subject of this Request for Admissions, identify the individual(s) who assisted in the preparation of the response and a listing of the Persons (identified by name and corporate title or job description) whose files were reviewed in responding to the data requests and this Request for Admissions.

Answer: The Persons responsible for preparing the response to these interrogatories are Katherine A. Donofrio and William E. Morrow.

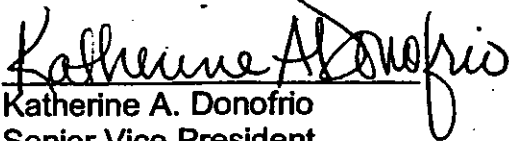
With respect to The Peoples Gas Light and Coke Company's responses to the data requests identified as CUB's Data Requests Sets 1-12; Staff's Data Requests Sets POL 1-15; and Attorney General Data Requests Sets 2-4, except those responses to which The Peoples Gas Light and Coke Company objected, the Person(s) responsible for preparing such responses, and under whose supervision and direction such responses were prepared, are: A. Akkerman; C. Blachut; R. C. de Lara; V. Grace; F. Graves; T. Hermann; S. Holler; A. Ikoma; S. Levine; J. Mueller; T. Puracchio; S. Richman; J. Slechta; T. Smith; J. Wirick; D. Wear; T. Zack; B. Zhou.

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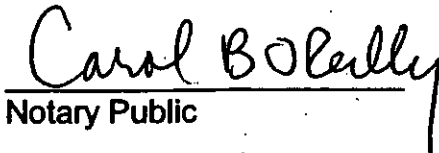
CERTIFICATION

As required by Illinois Supreme Court Rules 213 and 214, this response to the Interrogatories, together with any and all appendices and attachments thereto, was prepared and assembled under my supervision in accordance with instructions issued by the Citizens Utility Board. Subject to the recognition that, where so indicated, reasonable estimates have been made because books and records do not provide the required information, the information is, to the best of my knowledge, true, correct, and complete in accordance with the Rules.

Where copies rather than original documents have been submitted, the copies are true, correct, and complete. If the Citizens Utility Board uses such copies in any court or administrative proceeding, The Peoples Gas Light and Coke Company will not object based on the Citizens Utility Board not offering the original document.


Katherine A. Donofrio
Senior Vice President

SUBSCRIBED and SWORN to before me this
10th day of May, 2004.


Notary Public

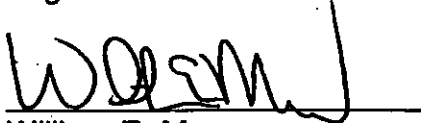


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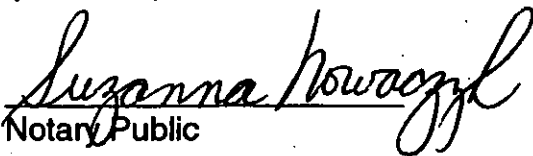
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William E. Morrow
Executive Vice President

SUBSCRIBED and SWORN to before me this
11th day of May, 2004.



Notary Public

Official Seal
Suzanna Nowaczyk
Notary Public - State of Illinois
My Commission Expires 2/29/2008

CERTIFICATION

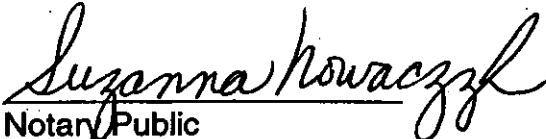
The responses to the data requests identified as the Citizens Utility Board's 13th set, together with any and all appendices and attachments thereto, was prepared and assembled, in part, under my supervision in accordance with instructions issued by the Citizens Utility Board. Subject to the recognition that, where so indicated, reasonable estimates have been made because books and records do not provide the required information, the information is, to the best of my knowledge, true, correct, and complete in accordance with applicable Illinois Supreme Court rules.

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William E. Morrow
Executive Vice President

SUBSCRIBED and SWORN to before me this
17th day of May, 2004.

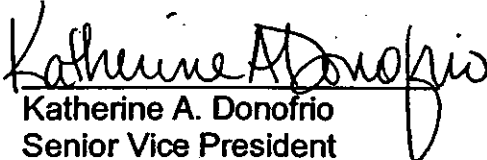

Notary Public

Official Seal
Suzanna Nowaczyk
Notary Public - State of Illinois
Commission Expires 2/29/2008

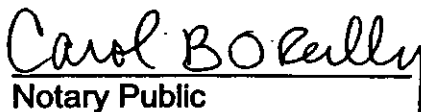
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Katherine A. Donofrio
Senior Vice President

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10th day of May, 2004.

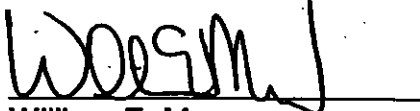

Notary Public



CERTIFICATION

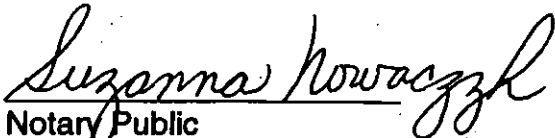
The responses to the data requests identified as Illinois Commerce Commission Staff's POL 16th set, together with any and all appendices and attachments thereto, was prepared and assembled, in part, under my supervision in accordance with instructions issued by the Illinois Commerce Commission Staff. Subject to the recognition that, where so indicated, reasonable estimates have been made because books and records do not provide the required information, the information is, to the best of my knowledge, true, correct, and complete in accordance with applicable Illinois Supreme Court rules.

Where copies rather than original documents have been submitted, the copies are true, correct, and complete. If the Illinois Commerce Commission Staff uses such copies in any court or administrative proceeding, The Peoples Gas Light and Coke Company will not object based on the Illinois Commerce Commission Staff not offering the original document.



William E. Morrow
Executive Vice President

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11th day of May, 2004.

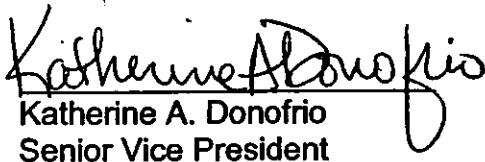

Notary Public

Official Seal
Suzanna Nowaczyk
Notary Public - State of Illinois
My Commission Expires 2/29/2008

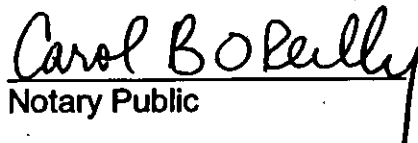
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Notary Public

